

**REDACTED**

**EXHIBIT C**  
**TO**  
**PLAINTIFFS' COMPLAINT**

REDACTED

# BRACEWELL

September 17, 2019

BY E-MAIL

**CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED**

Federal Bureau of Investigation  
Record/Information Dissemination Section  
Records Management Division  
170 Marcel Drive  
Winchester, VA 22602  
foipaquestions@fbi.gov / [REDACTED]

Re: FOIA Request #1355904-001

Dear Ms. Wilson:

My firm was recently retained as new counsel for Steven A.W. De Jaray and Perienne de Jaray (collectively, “Requestors”). In August 2016, Requestors filed a FOIA Request subsequently denominated by your agency as #1355904-001, which sought FBI records related to Requestors and several business entities.<sup>1</sup> On June 20, 2017, the FBI identified that it has 1,518 potentially responsive records. Requestors offered and continue to offer to pay any reasonable fees associated with having those records reviewed and released. The statutory deadline to produce responsive records to their request is long past due. Indeed, as far as we can tell from the FBI FOIA database, no Government Information Specialist has even been assigned yet to analyze the propriety of releasing these 1,518 documents to Requestors.

As you are aware, FOIA imposes strict deadlines on federal agencies when they receive a request for records pursuant to FOIA. An agency must determine whether to disclose responsive records and notify the requester of its determination within 20 working days of receiving a FOIA request. 5 U.S.C. § 552(a)(6)(A). An agency may extend the 20-working-day deadline for an additional 10 working days by giving a written notice to the requester that sets forth “unusual circumstances” to justify a deadline extension, which also requires that it provide the date by which the agency expects to make the determination. *Id.* § 552(a)(6)(B)(i).

---

<sup>1</sup> This request was submitted by Requestors’ prior counsel.

REDACTED

# BRACEWELL

Federal Bureau of Investigation

September 17, 2019

Page 2

The FBI must also make the responsive records “promptly” available, unless it can establish that certain unusual circumstances are present or that it may lawfully withhold records, or portions thereof, from disclosure. *Id.* § 552(a)(6). The FBI has woefully failed to comply with its statutory obligations in handling this request. Please confirm, in writing, that this request will be fully processed and responsive records released to Requestors by October 17, 2019. If all responsive records have not been produced by that accommodative deadline, which is far beyond what statutes require, Requestors will be forced to pursue more formal legal relief to protect their rights with respect to this request.

Please contact me if you have any questions.

Very truly yours,



Philip J. Bezanson  
Managing Partner, Seattle Office

PJB/ds

REDACTED

United States  
Postal Service

USPS TRACKING #

9590 9402 2387 6249 6417 58

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10



• Sender: Please print your name, address, and ZIP+4 in this box.

Philip J. Bezanson, Esq.  
Bracewell LLP  
701 5th Avenue, Suite 6200  
Seattle, WA 98104-7043

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
*Domestic Mail Only*

For delivery information, visit our website at [www.usps.com](http://www.usps.com).  
WINCHESTER, VA 22602

Certified Mail Fee \$3.50	
\$2.80	
U.S. Services & Fees (check box, add fee if applicable)	
<input checked="" type="checkbox"/> Return Receipt (checkmark)	\$40.00
<input type="checkbox"/> Return Receipt (electronic)	\$40.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$40.00
<input type="checkbox"/> Adult Signature Required	\$40.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$40.00
Postage \$0.00	
Total Postage and Fees \$4.50	

Postmark: 09/17/2019

Federal Bureau of Investigation  
Record/Information Dissemination Section  
Records Management Division  
170 Marcel Drive  
Winchester, VA 22602

See Reverse for Instructions

125 FORMS 4004 APRIL 2015 P&N 7530-02-000-0047

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature	<input checked="" type="checkbox"/> Agent
	<input type="checkbox"/> Addressee
B. Received by (Printed Name)	C. Date of Delivery
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
1. Article Addressed to: Federal Bureau of Investigation Record/Information Dissemination Section Records Management Division 170 Marcel Drive Winchester, VA 22602	
3. Service Type	
<input type="checkbox"/> Priority Mail Express®	
<input type="checkbox"/> Registered Mail™	
<input type="checkbox"/> Registered Mail Restricted Delivery	
<input type="checkbox"/> Certified Mail®	
<input type="checkbox"/> Certified Mail Restricted Delivery	
<input type="checkbox"/> Collect on Delivery	
<input type="checkbox"/> Collect on Delivery Restricted Delivery	
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
2. Article Number (Transfer from service label)	
7015 1520 0002 2585 2467	